

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

LISA BARBOUNIS,

Plaintiff,

v.

THE MIDDLE EAST FORUM, et al.,

Defendants.

Case No. 2:19-cv-05030-JDW

ORDER

AND NOW, this 13th day of November, 2020, upon consideration of Defendant The Middle East Forum's Motion for Contempt (ECF No. 72), and for the reasons set forth on the record during today's hearing with Counsel for the Parties, it is **ORDERED** that the Motion is **GRANTED**.

It is **FURTHER ORDERED** that, no later than November 16, 2020, Defendants shall provide to Plaintiff a list of all text messages in which a search term appears. Plaintiff shall arrange with the e-discovery vendor Cornerstone Discovery for the production of the complete text conversation for any text in which a search term appears, including all metadata necessary to identify related parts of a text conversation. The production shall be complete no later than November 18, 2020. In the event that Plaintiff asserts that any part of a text string is privileged, she may redact that portion of the text string, and she shall produce a privilege log within 48 hours of the document's production.

It is **FURTHER ORDERED** that Plaintiff shall arrange with Cornerstone for the production of all attachments to any document that has already been produced, along with metadata to permit Defendants to identify the parent-child relationship between a document and its attachment(s). In the event that Cornerstone reproduces documents with attachments, Plaintiff shall arrange with Cornerstone to provide information, through the use of metadata such as an MD5 hash field or

otherwise, to permit Defendants to identify documents that have already been produced in the case and are being re-produced with attachments. The production shall be complete no later than November 18, 2020. In the event that Plaintiff asserts that any attachment is privileged, she may withhold or redact that attachment, and she shall produce a privilege log within 48 hours of the production of the document to which it is related.

It is **FURTHER ORDERED** that counsel for the parties shall confer among themselves and with Cornerstone and, no later than the close of business on November 16, 2020, file on the docket a Status Report as to the following issues:

1. The schedule for producing text messages pursuant to the requirement above;
2. The schedule for producing attachments pursuant to the requirement above;
3. The total number of multimedia files on the Cornerstone database, broken down by file-type (*i.e.*, the number of audio files, the number of video files, and the number of static images) and categorized by file extension, as well as the number of multimedia files that Plaintiff's counsel has produced, the number of such files that Plaintiff's counsel has reviewed but not produced, and the number of files that Plaintiff's counsel has not yet reviewed;
4. Cornerstone's efforts to access and obtain data from Plaintiff Lisa Barbounis' Telegram account, any impediments to accessing and obtaining that data, and any proposed solutions to obtain it; and
5. What redactions were made to documents that Plaintiff produced on November 4, 2020, the basis for those redactions, and any proposed resolution concerning the redactions.

It is **FURTHER ORDERED** that starting today, and every day thereafter, Plaintiff's Counsel shall submit a daily status report to the Court via email to Chambers_of_Judge_Wolson@paed.uscourts.gov that sets forth the following information: 1) how

many documents he reviewed that day; 2) how many documents were produced that day; and 3) how much time he spent reviewing and/or producing documents that day.

It is **FURTHER ORDERED** that the Court determines that an award of attorneys' fees for MEF's costs of preparing this Motion and participating in today's hearing is appropriate pursuant to Fed. R. Civ. P. 37. MEF may file a Petition for Attorneys' Fees on or before November 20, 2020; Plaintiff's response is due on or before December 11, 2020.

BY THE COURT:

/s/ Joshua D. Wolson
JOSHUA D. WOLSON, J.